

TETON COMMUNICATIONS INCORPORATED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
334 York Street
Gettysburg, PA 17325

SUBJECT: Statement of Opposition to Proposed "Spectrum Refarming Docket
92-235"

Teton Communications, Inc. is a small business that employs 12 people in Southeast Idaho. We provide communications sales and service for approximately 1000 businesses, state agencies, school districts and local government agencies in the area. We have been in business since 1954, and have seen many changes in the communications industry. These changes in the past have been for the most part beneficial to the industry users as a whole.

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3rd - The "innovative shared use" 258 channel pairs in highband will create more business for Motorola and AT&T at the terrible expense of small businesses. Further, the Commission's proposal to require vertical channel loading, eliminate the adjacent channel station protection, and ease the geographic spacing for frequency re-use will effectively force existing users to abandon these degraded services in favor of SMR's or other carriers. Those that cannot justify the expense of moving (or staying) will obtain service comparable to the citizen's band. This proposal offers the economically privileged many opportunities for maintaining acceptable communications. However, it imposes severe service degradations for those customers who remain (even if they meet the new technical criteria), and unrealistically burdens the private user and taxpayer supported public users with excessive migration costs.

Teton Communications adamantly opposes this new Part 88 as it is now proposed.

Respectfully yours,


R. E. Hafla